



Department of Energy

Idaho Operations Office
1955 Fremont Avenue
Idaho Falls, ID 83401

March 7, 2005

Nicholas Ceto, INEEL Project Manager
EPA Region 10
712 Swift Blvd., Suite 5
Richland, WA 99352

Daryl F. Koch, Remediation Manager
Waste Management and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706-1255

SUBJECT: Request Waste Area Group (WAG) 9, Release Site ANL-04, *Sewage Lagoon*, be
Placed in Operable Unit (OU) 10-08 for Administrative Control (FMDP-FFA/CO-05-
123)

Dear Mr. Ceto and Mr. Koch:

The remediation of WAG 9, Materials and Fuels Complex (formerly Argonne National Laboratory – West), has been completed with the exception of release site ANL-04, the Sewage Lagoon. DOE requests that this release site be placed in OU 10-08 for administrative control.

The WAG 9 Comprehensive Record of Decision (ROD) (document number W7500-000-ES-04) was signed in September of 1998. It required action at ANL-04 due to elevated mercury concentrations in the lagoon sediments that represent a risk to ecological receptors. During phytoremediation and/or excavation/disposal of the other WAG 9 designated release sites, the Materials and Fuels Complex was given a new, long-term mission. Therefore, the lagoon is still in service and will be for many years. Lagoon sediments are continually covered with water and are not available for ecological exposure.

In the 2005 and subsequent Integrated 5-year Reviews for all CERCLA sites, the ANL-04 Sewage Lagoon will be acknowledged as a "was-not-remediated" site under the former OU 9-04 ROD, because of the continuing mission, and will be described as placed into OU 10-08. The OU 10-08 ROD is currently scheduled to be the last ROD signed for the Idaho site. If this is not the case, whichever ROD may be developed after OU 10-8 will be used for remedial action documentation. The WAG 9 Remedial Action Report, which describes the completed remediation of all other WAG 9 release sites, was recently transmitted to you.

Acknowledgement in the 5-year Review that ANL-04 was not remediated pursuant to the OU 9-04 ROD, for the reasons stated above, and that the intention of all parties is placement in OU 10-08 for subsequent investigation/remediation will administratively close remediation of WAG 9.

With your agreement, public notice of the requested administrative transfer will be in the Integrated 5-Year Review for the Idaho site.

Sincerely,

A handwritten signature in black ink that reads "Kathleen E. Hain". The script is cursive and fluid.

Kathleen E. Hain
CERCLA Lead